

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: **OCT 01 2013**

No. 13-MD-2481 (KBF)

CLASS ACTION

STIPULATED ADDENDUM TO
PROTECTIVE ORDER

ALL ACTIONS.

The parties agree that the Protective Order (ECF No. 381), signed by Judge Katherine B. Forrest on May 22, 2014, shall include the following addendum to Paragraph 19 of the Protective Order:

Outside Counsel Only Discovery Material may only be disclosed to the following persons:

- (a) attorneys employed by outside law firms representing the parties to this action, along with any paralegal, clerical and/or other assistant employed by such law firms and involved in this matter;

- (b) the non-party producing the Outside Counsel Only Discovery Material;

- (c) as to any document, its author, its addressee, and any other person

indicated on the face of the document as having received a copy;

(d) any person retained by a party to serve as an expert witness or otherwise provide specialized advice to counsel in connection with this action, provided such person has first executed a Non-Disclosure Agreement in the form annexed as an Exhibit A to this Protective Order;

(e) stenographers engaged to transcribe depositions conducted in this action;

(f) independent photocopying, graphic production services, or litigation support services employed by the parties or their counsel to assist in this action and computer service personnel performing duties in relation to a computerized litigation system;

(g) the Court and its support personnel; and

(h) any other person whom the producing person agrees in writing may have access to such Outside Counsel Only Discovery Material.

SO STIPULATED AND AGREED:

DATED: September 29, 2015



NUSSBAUM LAW GROUP, P.C.
Linda P. Nussbaum
Bradley J. Demuth
570 Lexington Avenue, 19th Floor
New York, NY 10022
Telephone: (212) 702-7055
(212) 681-0300 (fax)
Email: bdemuth@nussbaumpc.com

So ordered.

K.B. For
wsj

10/1/15